

# EXHIBIT 24

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

PLANNED PARENTHOOD CENTER FOR  
CHOICE, et al.,

Plaintiffs,

v.

No. 1:20-cv-00323

GREG ABBOTT, in his official capacity as  
Governor of Texas, et al.,

Defendants.

**DECLARATION OF CURTIS BOYD IN SUPPORT OF  
PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

I, CURTIS BOYD, declare as follows:

1. I am an owner of Southwestern Women's Surgery Center ("Southwestern") in Dallas, a plaintiff in this lawsuit. I also own Southwestern Women's Options ("Women's Options"), a healthcare facility in Albuquerque, New Mexico that provides abortion care. I submit this declaration in support of Plaintiffs' request for a preliminary injunction, which seeks to enjoin the March 22, 2019 Executive Order No. GA-09 as interpreted by the Texas Attorney General on March 23, 2020 to ban all previability abortion procedures in the state except where immediately necessary to protect the life or health of a patient.

2. Since the Executive Order was interpreted to bar most abortion services in Texas on March 23, abortion care has been inaccessible to many patients in Texas. Given how many patients seek abortion in Texas, thousands of patients have been thrown into uncertainty by the Order. At times, since the Order went into effect, abortion has only been available in Texas in medical emergencies; at other times, medication abortion and/or procedural abortion in certain circumstances where a patient is on the cusp of the legal limit in Texas have also been allowed.

3. Southwestern provides abortion services through 21 weeks, 6 days of pregnancy. It has a well-equipped facility, expert staff, and, presently, patients desperate for care, which we are forbidden to provide.

4. Because we routinely provide individual counseling for all patients, we are privy to their thoughts and feelings as they decide to continue or end a pregnancy. Our patients take the responsibilities of parenthood seriously. The majority already have one or more children, so they consider the welfare of their existing family in making decisions about their current pregnancy. Those who do not yet have children hope to one day—but not now. They may believe they are too young to parent, not yet independent from their own parents, not in a stable relationship, or not financially able to support themselves and a child at this time. Whatever their reason, their choice is valid and essential to their ability to chart their own course in life.

5. Our patients have almost uniformly given the decision to have an abortion extensive, careful thought. Most have talked their situation over with the important people in their life—whether a husband, partner, parent(s), close relative(s), or friend(s).

6. Since March 23, due to the extraordinary number of patients who cannot be seen in Texas under the Executive Order, Women's Options has received unprecedented demand for care from patients traveling from Texas. It is hard to adequately describe the desperation of these Texas patients.

7. It is not unusual for Women's Options to provide services to patients traveling from other states, including Texas. We also receive referrals from providers in Texas for patients who cannot be seen in Texas for one reason or another.

8. Since March 23, we have seen more than double our typical amount of Texas patients, either referred to us by a physician or calling independently because of the Executive Order.

9. At this time of year, our clinic typically has a one week wait time between a patient calling or being referred to the clinic, and the patient's appointment for an abortion. As of April 13, 2020, given the influx of patients from other states, including Texas, the wait time for an abortion appointment at the Albuquerque facility is at least 4 weeks.

10. We are scheduling appointments for Texas patients who, after desperately trying to get in to see us for care, are ultimately unable to navigate the challenges of traveling to us during the pandemic. Each time Texas shuts down abortion services, Southwestern refers patients out of state. Only a small percentage of those women are ultimately able to take time away from work, find childcare, have transportation to make the trip, and access to money to pay the additional costs of travel. Most of our patients face these challenges under the best of circumstances, but these challenges are exponentially increased during the COVID-19 pandemic.

11. In the face of COVID-19 and its associated, additional health and financial risks for all people, and pregnant women in particular, our patients are in even greater need of safe, timely abortion care. They are experiencing high levels of stress and fear around traveling during the pandemic, caring for their families given that so many people are out of work and relying on dwindling resources, and being forced to remain pregnant against their wishes during this public health emergency.

12. To deny patients care, to force them to travel out of state, or to needlessly delay care, especially in this uncertain time, is simply cruel.

13. We are trying to accommodate as many of these Texas patients in Albuquerque as possible. But, we can only see a small fraction. The clinics to which Southwestern refers, including Women's Options, are simply overwhelmed with requests from Texas women and often unable to meet the sudden increase in need for timely care.

14. The Texas women we do see at Women's Options are incredibly grateful. They express that we "saved" them or families; that they don't know "what they would have done" if we hadn't helped them. We are incredibly disheartened about the circumstances that these patients have had to navigate during this already difficult public health crisis. I do not understand how forcing patients to remain pregnant during this time in any way helps to reduce people traveling from home, observe COVID-19 guidance, or preserve capacity of the healthcare system. Rather, it seems that the Order actually undermines all of those goals. Women who remain pregnant only require increasingly involved healthcare, to say nothing of the incredible harm done to women forced to continue pregnancies against their will during the pandemic.

I declare under penalty of perjury that the foregoing is true and correct.



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Curtis Boyd

Executed April 15, 2020